

Pro Se 15 (Rev. 12/16) Complaint for Violation of Civil Rights (Non-Prisoner)

FILED

UNITED STATES DISTRICT COURT

for the

Eastern District of Virginia

2025 FEB 19 P 1:12



ALEXANDRIA Division

PHELICEA M. REDD

Case No.

1:25-CV-313-CMH-WBP

(to be filled in by the Clerk's Office)

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA

Jury Trial: (check one)

☐

Yes

☒

No

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names. Do not include addresses here.)

COMPLAINT FOR VIOLATION OF CIVIL RIGHTS
(Non-Prisoner Complaint)

NOTICE

Federal Rules of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

Except as noted in this form, plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

In order for your complaint to be filed, it must be accompanied by the filing fee or an application to proceed in forma pauperis.

Pro Se 15 (Rev. 12/16) Complaint for Violation of Civil Rights (Non-Prisoner)

I. The Parties to This Complaint**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	PHELICEA M. REDD		
Address	2630 S VEITCH ST APT 209		
	ARLINGTON	VA	22206
	<i>City</i>	<i>State</i>	<i>Zip Code</i>
County	ARLINGTON		
Telephone Number	931-218-9919		
E-Mail Address	PHELICEAREDD@GMAIL.COM		

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known) and check whether you are bringing this complaint against them in their individual capacity or official capacity, or both. Attach additional pages if needed.

Defendant No. 1

Name	U.S. DISTRICT COURT EASTERN DISTRICT OF VIRGINIA		
Job or Title (if known)	401 COURTHOUSE SQUARE		
Address			
	ALEXANDRIA	VA	22314
	<i>City</i>	<i>State</i>	<i>Zip Code</i>
County			
Telephone Number			
E-Mail Address (if known)			
<input type="checkbox"/> Individual capacity <input checked="" type="checkbox"/> Official capacity			

Defendant No. 2

Name			
Job or Title (if known)			
Address			
	<i>City</i>	<i>State</i>	<i>Zip Code</i>
County			
Telephone Number			
E-Mail Address (if known)			
<input type="checkbox"/> Individual capacity <input type="checkbox"/> Official capacity			

Pro Se 15 (Rev. 12/16) Complaint for Violation of Civil Rights (Non-Prisoner)

Defendant No. 3

Name

Job or Title (if known)

Address

City

State

Zip Code

County

Telephone Number

E-Mail Address (if known)

☐

Individual capacity

☐

Official capacity

Defendant No. 4

Name

Job or Title (if known)

Address

City

State

Zip Code

County

Telephone Number

E-Mail Address (if known)

☐

Individual capacity

☐

Official capacity

II. Basis for Jurisdiction

Under 42 U.S.C. § 1983, you may sue state or local officials for the “deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws].” Under *Bivens v. Six Unknown Named Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), you may sue federal officials for the violation of certain constitutional rights.

A. Are you bringing suit against (check all that apply):

☒Federal officials (a *Bivens* claim)☒

State or local officials (a § 1983 claim)

B. Section 1983 allows claims alleging the “deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws].” 42 U.S.C. § 1983. If you are suing under section 1983, what federal constitutional or statutory right(s) do you claim is/are being violated by state or local officials? Title 18, U.S.C., Section 242 - Deprivation of Rights Under Color of Law Violation of my Civil/Constitutional Rights

C. Plaintiffs suing under *Bivens* may only recover for the violation of certain constitutional rights. If you are suing under *Bivens*, what constitutional right(s) do you claim is/are being violated by federal officials?

Pro Se 15 (Rev. 12/16) Complaint for Violation of Civil Rights (Non-Prisoner)

Due process of law; judicial process as in Judges follow the law. Civil rights: I'm entitled to the same rights and privileges as every other citizen in Virginia and the United States. I'm entitled to have laws through the legislative process.

- D. Section 1983 allows defendants to be found liable only when they have acted "under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia." 42 U.S.C. § 1983. If you are suing under section 1983, explain how each defendant acted under color of state or local law. If you are suing under *Bivens*, explain how each defendant acted under color of federal law. Attach additional pages if needed.
Additional pages attached
-

III. Statement of Claim

State as briefly as possible the facts of your case. Describe how each defendant was personally involved in the alleged wrongful action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

- A. Where did the events giving rise to your claim(s) occur?
U.S DISTRICT COURT, EASTERN DISTRICT OF VIRGINIA, ALEXANDRIA
-
- B. What date and approximate time did the events giving rise to your claim(s) occur?
JAN 2025-FEB 2025
-
- C. What are the facts underlying your claim(s)? (*For example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?*)
Attached
-

Pro Se 15 (Rev. 12/16) Complaint for Violation of Civil Rights (Non-Prisoner)

IV. Injuries

If you sustained injuries related to the events alleged above, describe your injuries and state what medical treatment, if any, you required and did or did not receive.

V. Relief

State briefly what you want the court to do for you. Make no legal arguments. Do not cite any cases or statutes. If requesting money damages, include the amounts of any actual damages and/or punitive damages claimed for the acts alleged. Explain the basis for these claims.

MONETARY DAMAGES: \$9,000,000,000

BASIS: U.S. CONSTITUTION

Pro Se 15 (Rev. 12/16) Complaint for Violation of Civil Rights (Non-Prisoner)

VI. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 18 FEB 2025

Signature of Plaintiff

Printed Name of Plaintiff

PLAINTIFF
PHENUEA REED

B. For Attorneys

Date of signing: _____

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Address

City

State

Zip Code

Telephone Number

E-mail Address

CLAIM #1: FEES

I'm entitled to the same rights and privileges of every other citizen in Virginia and the United States. That's my constitutional right. If I have to pay \$405 for filing fee, then everybody has to pay \$405 for filing fee. If others pay \$0 for filing fee, then I'm entitled to file for \$0 without justification. This court has different privileges for citizens based on income or lack thereof. How much do citizens in Maryland pay for filing fees? West Virginia?

The fee application waiver requires everything except a blood sample. Unless I lie, I cannot explain why I cannot pay the costs of the proceedings. First, there's no logical justification for paying \$405, especially without showing citizens where the money goes. It's not for making copies because they charge for copies. Not to pay salaries because that would be illegal. Congress funds the U.S. Judiciary's budget, so I have no idea what they do with my money. Although the general district courts' fees are unlawful as well, they only charge a \$52 filing fee AND the Sheriff executes the summons for another \$25. They could use that money for a slush fund, and nobody would complain because it's not an insane amount. It's the same as buying one bag of groceries in Arlington.

Three lateral courts: \$52 filing fee, \$405 filing fee, \$600 filing fee (appeal). It makes no sense

Summons

The Pro Se handbook states that I must follow the Federal Rules and Local Rules of Civil Procedures throughout the process. I used a person's name on a summons instead of their office name and a clerk told me it was wrong. I asked if I could change it, and she told me I had to file a motion. Rule 4 of the Federal Rules of Civil Procedures, though detailed, does not mention filing a motion. Local Civil Rule 4 mentions nothing of filing a motion for that and neither does the Pro Se handbook. There's no law requiring me to file a motion to change a summons. I asked another clerk what to do in cases of wrong/bad address on a summons, same thing. There's no law that states that I must send the summons to the same address that's on the summons either. Now we have clerks making up laws. I'm not a lawyer so I googled, "how to file a motion in virginia pro se" and I get jack and shit. Different situation, I went back the following week and asked for a copy of a previously filed summons and the clerk told me, "I can't just issue you another copy, you have to submit a letter to the clerk to get a copy." Where does the letter go? In the trash? People want to waste my time making up stuff like filing motions and waiting on hearings to file a motion just to get a freaking address changed.

Virginia Code Title 8.01. Civil Remedies and Procedure. I found two state codes (not laws) for Summons, § 8.01-296. Manner of serving process upon natural persons and § 8.01-299. How process served on domestic stock corporations, nonstock corporations, and limited liability companies generally. Vacourts.gov, "It is essential in filing suit that the plaintiff knows the defendant's current address. This information is necessary to provide legally valid notice, known as "service of process." If service of process **is not made according to law**, the plaintiff's lawsuit may not go forward." "When a defendant is a corporation, suit may be filed against the corporation by serving the registered agent for the corporation. A simple way to locate the name and address of the corporation's registered agent is to call the Service of Process Division in the Office of the Clerk for the State Corporation Commission in Richmond, (804) 371-9733 or toll free in Virginia, 1-866-722-2551, or visit its Web site (**website not found**) to access the Clerk's Information System."

I'm not a Sheriff, Deputy, Police Officer, or Secretary of the Commonwealth. I do not have the resources to track down people's home or business addresses. If it's not on the internet, I do not have access to it. I don't do skip tracing, do not have access to the same systems, tools, and databases that law enforcement use. They can easily locate a person's home address anywhere in the country. If I have the wrong address, these people expect me to file a motion or amendment or something or show up to court and find out that it was a bad address. Then file with a new address and come back to court in another 30 days, again making up their own laws just to waste my time. If I didn't have it the first time, where in the heck do they think I'm supposed to find another address the second time? What's wrong with these people?

Federal Rules for Civil Procedure states, "**summons state the time within which the defendant must appear and defend**" That's not anywhere on the Summons Form that I submitted to the clerk. The court time and date appear on all my forms that I submitted in the general district court. After filing the first civil complaint in this court, I asked the clerk, "when am I supposed to appear in court?" She told me to read the Pro Se handbook. I understand that she can't provide any legal advice. Local Civil Rules: (E) Return Date: Except as otherwise provided by an order of the Court or by these Local Rules, **all motions shall be made returnable to the time obtained from and scheduled by the Court for a hearing** thereon. The **moving party shall be responsible to set the motion for hearing** or to arrange with opposing counsel for submission of the motion without oral argument. Unless otherwise ordered, a motion shall be deemed withdrawn **if the movant does not set it for hearing (or arrange to submit it without a hearing) within thirty (30) days after the date on which the motion is filed**. The non-moving party also may arrange for a hearing. Before endeavoring to secure an appointment for a hearing on any motion, it shall be incumbent upon the counsel desiring such hearing to meet and confer in person or by telephone with his or her opposing counsel in a good-faith effort to narrow the area of disagreement. In the absence of any agreement, such conference shall be held in the office of the attorney nearest the Court in the division in which the action is pending. In any division that has a regularly scheduled motions day, the motion should be noticed for the first permissible motions day. The hearing date of motions for summary judgment is also governed by Local Civil Rule 56. The

Summons issued by this court states to the defendant, “Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency....you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedures” Does any of that make any sense to you? Not only the text in red but I’m supposed to guess who the opposing counsel is for civil complaints? Am I supposed to Google a name for JPMorgan Chase’s attorney and start contacting random people?

The general district court has forms for subpoena duces tecum. Simple, I fill it out and submit it to the clerk who reviews it and signs it. I mail it to the defendant. The Eastern District Court requires me to submit a letter to the clerk for a subpoena (Federal Rule 4.1) so I have to google, “how to submit a letter to the clerk for subpoena” and search for examples. After submitting the letter, I have to wait for the clerk to issue the subpoena.

Local and Federal Rules require me to proceed with the claim in two different manners. I’m supposed to file a brief. Is that like the Tiktok case that takes 20 pages to explain? I don’t have any briefs and I’m not typing up pages of non-sense filled with legal jargon and Latin terms to appear smart. There’s no law requiring me to waste my time preparing briefs. I’m not a lawyer. My complaint is what I submitted on the complaint form.

CLAIM: APPEALS

The Judge’s letter outlined instructions for filing an appeal and noted that the appeal would go through another inferior court (Circuit) instead of the Supreme Court. These are the same level Judges, just going lateral so I’m not sure what’s going on there. That’s as unlawful as requiring me to pay \$600 to appeal. Again, they’re wasting my time and money. The letter didn’t explain who or what gives the circuit court appellate jurisdiction. The Constitution specifically states in Article III Section 2:

“The judicial Power shall extend to all Cases, in Law and Equity, arising under this Constitution, the Laws of the United States (power to review laws before the President signs them and the power to rule laws unconstitutional), and Treaties made (power to review treaties before signed), or which shall be made, under their Authority; - to all Cases affecting Ambassadors, other public Ministers and Consuls; - to all Cases of admiralty and maritime Jurisdiction; - to Controversies to which the United States shall be a Party; - to Controversies between two or more States; - [between a State and Citizens of another State;-]* -between Citizens of different States, -between Citizens of the same State claiming Lands under Grants of different States, and between a State, or the Citizens thereof; and foreign States, Citizens or Subjects.

In all Cases affecting Ambassadors, other public Ministers and Consuls, and those in which a State shall be Party, the Supreme Court shall have original Jurisdiction. In all the other Cases before mentioned, the supreme Court shall have appellate Jurisdiction, both as to Law and Fact, with such Exceptions, and under such Regulations as the Congress shall make.”

CLAIM: This Court does not allow me to e-file civil cases. What law restricts me from the same privileges of other citizens in Virginia and citizens in other states? In Alabama, citizens can file civil lawsuits online. It's 2025! Their education system is one of the worst in the country and if they can do it, there's no way that every other state can't do it. Apparently, only citizens with the titles of attorney/lawyers can e-file or members of the Virginia State Bar. As if everybody else is retarded and can't upload forms on the internet. While these people work remote and sit in the comfort of their homes and file complaints, I drive 25 minutes to the courthouse, pay for parking, and deal with a different clerk with a different standard every time. I could've filed 50 cases by now.

I use the Pro Se Handbook and online forms for Pro Se filing. I understand black and white. If they can't take forms with whiteout, put it in the book and I would've never used whiteout on a form. If they need three copies of a summon, put it in the book and I'll bring three copies every time. If they can only take exact amount and not give change, put it in the book. If they want front and back copies or single page copies, put it in a book. If I need to bring an extra copy of the complaint for the clerk's office, put it in the book. I don't care about printer cartridges and printer paper. If they want 10 copies, I'm bringing in 10 copies. I will bring everything that they require me to bring. I might forget to sign a form or misspell a word from typing too fast and not double checking, but one thing I don't do is waste people's time (unless it's the military because they insist on wasting mine). One used the justification that it's because she's worked there 10 years which means nothing to me. The same person requires me to submit a JS-44 with each complaint. Local Civil Rule 4 states, "The Clerk shall require a complete and executed AO Form JS 44(a), Civil Cover Sheet, to accompany each civil action filed **except as to actions filed by prisoners and other litigants proceeding pro se.**" I comply and bring the form anyway because I require a service from them.

I have to file civil claims in three different courts in VA depending on the amount and jurisdiction and statutes. Is it a math problem? The Judges over at the General District Court in Arlington can't count past \$25,000? Why can't they make judgement on a claim for \$200,000. Then the Circuit Court can also hear cases up to \$25,000. What makes the Judge at one court different from the Judge at the other court? Do they have different levels of education? Different credentials? Different levels of experience? It sounds like a scam. None of this makes sense to me and it all sounds made up because it doesn't state that in the Federal Judiciary Act of 1789. Courts today don't even serve the same purpose as the Courts back then.

In Jan, I went to the circuit court and asked the clerk questions, and she handed me a different civil cover sheet form with no instructions. She gave me handouts with different websites for legal aid and other legal resources. I wanted to submit a 15-page Judicial Review of the Constitution to the U.S. Supreme Court. Everything that I found on the internet for submitting notification or an application for a Judicial Review only pertained to appealing decisions and challenging government decisions at the federal level. I can file a petition with a circuit court 30 days from notice of a final decision. On one of the websites, I asked them to please explain to me step by step the process for submitting a Judicial Review from start to finish and received no

response. If I would've said, "I was drinking and driving last night and got a DUI, what should I do?" I would've received responses from hundreds of lawyers ready to charge me \$15k and defend me for a crime that I admitted to. They could've at least given me the first step and then required me to pay for any additional info.

On one hand there's the Constitution and on the other hand the inconsistencies between the Federal Judiciary Act of 1789, U.S. Courts Judiciary and other policies, Federal Rules for Civil Procedures, Federal Rules for Civil Procedures for use on the Committee on the Judiciary/House of Representatives, Virginia Constitution, Virginia Codes, and Local Rules for Civil Procedures. The inefficiency of the entire process of filing a lawsuit is insane. If I were a lawyer, I would've quit by now and in the first 30 days. There's no way that I'd be able to function in a system as complicated as the Judicial System.

CLAIM IV: A judge ruled on a case and dismissed it before I served the summons to the defendant. (Redd v Brinkema)

Neither the Constitution (written in English) or any U.S. law grants immunity to Judges and Courts, or any citizen in the United States or the Several States in the Union

Judges who make up their own laws violate my Constitutional rights to having laws go through the legislative process for enactment. I could go on and on and cite every illegal and unlawful statement and requirement in the Federal and Local Rules of Civil Procedures but why should I have to explain that to a Judge?

Article VI

This Constitution, and the Laws of the United States which shall be made in Pursuance thereof; and all Treaties made, or which shall be made, under the Authority of the United States, shall be the supreme Law of the Land; and the Judges in every State shall be bound thereby, any Thing in the Constitution or Laws of any State to the Contrary notwithstanding.

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

PHILICIA REDD
Plaintiff(s),

v.

Civil Action Number: 1:25-CV-313

U.S. DISTRICT COURT
Defendant(s),

LOCAL RULE 83.1 (N) CERTIFICATION

I declare under penalty of perjury that:

No attorney has prepared or assisted in the preparation of NEW CASE / CIVIL RIGHTS.
(Title of Document)

PHILICIA REDD
Name of Pro Se Party (Print or Type)

[Signature]
Signature of Pro Se Party

Executed on: 18 FEB 2025 (Date)

OR

The following attorney(s) prepared or assisted me in preparation of _____.
(Title of Document)

(Name of Attorney)

(Address of Attorney)

(Telephone Number of Attorney)

Prepared, or assisted in the preparation of, this document.

(Name of Pro Se Party (Print or Type)

Signature of Pro Se Party

Executed on: _____ (Date)